



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**MEMORANDUM**

TO: The Commission

FROM: Lois G. Lerner  
Acting General Counsel

BY: Abigail A. Shaine *AAS*  
Acting Associate General Counsel

SUBJECT: MUR 5019—Resubmission of Factual and Legal Analyses and Additional  
Recommendations

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**I. Background**

On March 6, 2001, the Commission found reason to believe that Keystone Corp. and the Keystone Federal PAC violated various provisions of the Act. *See Attachment 1 (certification).*

6040-904-40-22

**III. Additional Recommendations to the First General Counsel's Report**

In the First General Counsel's Report, this Office recommended that the Commission find no reason to believe Gibbons for Congress violated 2 U.S.C. § 441a(f). The Commission approved this recommendation. See Attachment 1 (certification, item D10). The Report should also have recommended that the Commission close the file as it pertains to Gibbons for Congress and Robert Legoy, as treasurer. This Office now so recommends.

Similarly, the Commission found no reason to believe that 18 individuals who contributed to the Keystone Federal PAC on March 30, 2000, violated 2 U.S.C. § 441a(a)(1)(A) either by earmarking their contributions or by operation of 11 C.F.R. § 110.1(h). See Attachment 1 (certification, item A6). Again, the First General Counsel's Report should also have recommended that the Commission close the file as it pertains to these individuals. This Office now so recommends.

**IV. Recommendations**

- 1.
2. Close the file with respect to Gibbons for Congress and Robert Legoy, as treasurer; and
3. Close the file with respect to the 18 individuals named in item A6 of the certification for the March 6, 2001 executive session.

Staff Assigned: Brant Levine

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